



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

July 11, 1993

Mr. James Shafer
Northern Division
Naval Facilities Engineering Command
Code 1821/JS
10 Industrial Hwy., Mail Stop #82
Lester, PA 19113-2090

Re: Draft Final Record of Decision
Sites 5 and 6
Nas Brunswick

Dear Jim:

The United States Environmental Protection Agency (EPA) has reviewed the document entitled "Draft Final Record of Decision for a Remedial Action at Sites 5 and 6, Naval Air Station Brunswick, Brunswick, Maine" dated July 1993.

EPA's comments regarding this document are provided in Attachment I to this letter. Revisions to the ARARs table are still being worked on by the Office of Regional Counsel. These revisions will be forwarded to the Navy in the next several days. EPA apologizes for this delay.

Upon satisfactory response to our comments, EPA anticipates that we will provide concurrence on this ROD.

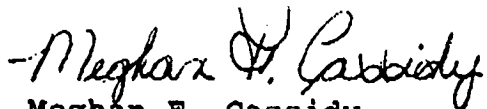
EPA requests that the Navy keep this office informed regarding the schedule for finalization of the ROD. Specifically, the Navy should notify EPA when Navy signature is anticipated on the ROD and when we can expect receipt of the signed document at EPA. Once EPA receives an original signature page executed by the appropriate Navy representative, EPA will sign the ROD. Upon EPA signature, the ROD becomes effective.

As per the Federal Facility Agreement, the Navy must also submit any press releases regarding signature of this ROD to this office for review and approval prior to publication.



Please contact me at (617) 573-5785 if you have any questions regarding EPA's comments or finalization of the ROD.

Sincerely,



Meghan F. Cassidy
Remedial Project Manager

Enclosures

cc: Nancy Beardsley/ME DEP
Jim Caruthers/NASB
Bob McGirr/ABB
Susan Weddle/BASCE
Sam Butcher/Harpswell Community Rep.
Rene Bernier/Topsham Community Rep.
Bob DiBiccaro/EPA
Bob Lim/EPA

ATTACHMENT I

The following are EPA's comments pertaining to the document entitled "Draft Final Record of Decision for a Remedial Action at Sites 5 and 6, Naval Air Station Brunswick, Brunswick, Maine" dated July 1993.

1. Page 3, 1st line: The word "necessary" should be inserted before "subgrade fill" in this line.
2. Page 3, 2nd to last sentence: The sentence should be rewritten as follows.

"The sampling results will be submitted to the regulatory agencies and the Technical Review Committee for review."

3. Page 3, ¶ 2: The following sentence should be inserted at the end of this paragraph.

"The landfill at Sites 1 and 3 where the material will be placed, is the subject of a separate ROD (NAVY, 1992) and will be closed in accordance with all applicable federal and state requirements, and long-term monitoring will be implemented at these sites."

4. Page 6: The EPA signature block should read as follows.

Paul G. Keough
Acting Regional Administrator, USEPA

5. Page 17, 1st line: The first line should be revised to read as follows.

"The enforcement history at NAS Brunswick, including Sites 5 and 6, is summarized as follows:"

6. Page 20: The last sentence on this page should be deleted and the following text inserted.

"Final RODs for Sites 1 and 3, and Site 8 have been signed (NAVY 1992a and 1993c). In addition, an Interim ROD for the Eastern Plume has also been signed (NAVY 1992b)."

7. Page 21, ¶ 2: The references provided in the second sentence appear to be reversed. According the reference page provided, the text in the parenthesis should read "(ABB-ES, 1993b and 1993a)".

8. Page 27, ¶ 2: The following sentence should be added to the end of this paragraph.

"Since asbestos fibers do not migrate in the subsurface environment (Gilbert et al., 1981), groundwater at Site 5 was not monitored."

9. Page 28, ¶ 1: The following text should be inserted before the second sentence of this paragraph.

"Asbestos at Site 6 is also above the groundwater table, and therefore the groundwater was not monitored for asbestos. However, four monitoring wells..."

10. Page 28, ¶ 2: The last sentence of this paragraph should be deleted since one of EPA's prior comments recommends moving this information to the discussion regarding Site 5 on the previous page.
11. Page 48, last ¶: Include an estimate of the volume of asbestos materials to be excavated from each of the sites.
12. Page 55, ¶ 3, last sentence: The phrase "Under current conditions," should be inserted at the beginning of this sentence.
13. Page 56, 1st sentence: This sentence should be rewritten as follows.

"The cover system component of the Selected Remedy at Sites 1 and 3, which meets RCRA Subtitle C requirements, meets or exceeds the performance requirements..."

14. Page 61, ¶ 2, 3rd sentence: The information presented here indicates that 8,800 cy is a conservative estimate and that the actual volume of to be removed from Site 6 could be significantly less. This appears to contradict information on pages 48 and 49 that indicates that predesign studies indicated there is likely to be a larger volume of material to be excavated (approximately 18,700 cy). Clarify this discrepancy in the text.
15. Page 66, ¶ 3: The term SHERP should be defined in the text.
16. Page 66, ¶ 4: There is a spelling error in the first sentence of this paragraph. The word "surey" should be "survey".
17. Page 67, ¶ 1: "GM" as presented in the text should be defined.
18. Page 68, ¶ 1: The first full sentence in this paragraph indicates that the staging areas for Sites 5 and 6 are shown on Figures 2 and 3. These figures do not contain this information. Revise the figures to show the staging areas.

19. Page 70, 4th sentence: This sentence indicates that after the excavation of rubble and debris at Site 5 confirmatory sampling will take place. Since there is no rubble and debris expected at Site 5 it is unclear to what this sentence refers. Also, it should be made clear that confirmatory sampling will take place at both Sites 5 and 6.
20. Page 74, ¶ 2, 2nd sentence: It appears that the word "moved" in this sentence should be "mowed".
21. Page 81: The following chemical-specific policies, criteria, and guidelines should be removed from the text and the ARARs table.
 - USEPA RfDs
 - USEPA Human Health Assessment Group CSFs
22. Page 81: The following location-specific ARARs should be removed from the text and ARARs table since groundwater is not a media of concern at these sites.
 - Maine Standards for Classification for Groundwater
23. Page 82: The Action-specific ARARs dealing with RCRA Subtitle C, specifically those listed below, should be removed from the text and the ARARs table since hazardous waste is not encountered (or expected) at Sites 5 and 6.
 - Resource Conservation and Recovery Act (RCRA) - Preparedness and Prevention
 - RCRA - Contingency Plan and Emergency Procedures
 - RCRA - Closure and Post-closure
24. Page 82: Reference to the Maine Hazardous Waste Management Rules should be deleted from the text and the ARARs table since no hazardous waste has been encountered, or is expected, at Sites 5 and 6.
25. Page 85, ¶ 2, 5th line: There will be no treatment plant in operation in relation to Sites 5 and 6. Revise the sentence to state that "Contingency plans will be developed and implemented during the site work."
26. Page 86, ¶ 2: Clarify in the text that the discussion presented here regarding RCRA Subtitle D pertains to the ultimate location of disposal, i.e.; Sites 1 and 3.
27. Page 90, ¶ 1: The first three sentences in this paragraph should be deleted. The paragraph should begin with the sentence "This remedy does not meet the statutory preference for treatment."

28. Page 92, 2nd sentence: The phrase "as well as non-hazardous construction rubble from Site 6," should be inserted after Sites 5 and 6 in this sentence.
29. Appendix D: The Administrative Record index should include a section pertaining to the Federal Facility Agreement.